

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,)	
)	
Plaintiffs,)	
)	
v.)	C. A. No. 05-823-***
)	
STANLEY TAYLOR, et al.,)	JURY TRIAL REQUESTED
)	
Defendants.)	

**DEFENDANT STAN TAYLOR'S RESPONSE
TO PLAINTIFF'S REQUEST FOR ADMISSIONS**

Pursuant to Federal Rule of Civil Procedure 36, Defendant responds to Plaintiff's Request for Admissions as follows:

1. Plaintiff George A. Jackson's July 19, 2005, grievance was filed as an "Emergency Grievance" and received by the SCI Warden's Office on July 20, 2005.

RESPONSE: Answering Defendant has no personal knowledge to admit or deny this statement.

2. Plaintiff George A. Jackson's July 19, 2005, "Emergency Grievance" was not returned to the inmate for processing through the normal Inmate Grievance Procedure (IGP) by the SCI's Warden's Office.

RESPONSE: Answering Defendant has no personal knowledge to admit or deny this statement.

3. Plaintiff George A. Jackson's July 19, 2005, "Emergency Grievance" was received by the Chairman on July 21, 2005.

RESPONSE: Answering Defendant has no personal knowledge to admit or deny this statement.

4. Plaintiff George A. Jackson's July 19, 2005, "Emergency Grievance" was not returned to the inmate as unprocessed grievance by the SCI Grievance Chairman.

RESPONSE: Answering Defendant has no personal knowledge to admit or deny this statement.

5. During all times relevant to the filing and reviewing of Plaintiff George A. Jackson's "emergency grievance" the Inmate Grievance Chairman was Michael J. Atallian.

RESPONSE: Answering Defendant has no personal knowledge to admit or deny this statement.

6. A description of George A. Jackson's "emergency grievance" states, "Inmate workers are constantly experiencing daily symptoms of heat exhaustion (excessive sweating, shortness of breath, etc.,) from the deprivation of an adequate ventilation at the work place."

RESPONSE: Admitted, that these words are from inmate Jackson's grievance. Denied that inmate Jackson's grievance is factually correct.

7. A description of George A. Jackson's "emergency grievance" states, "...and compensate inmate workers for irreparable damages suffered from delay/denial of a safe and healthy work environment."

RESPONSE: See Response to No. 6.

8. All twenty-five named Plaintiffs was [sic] committed to the custody of the Department of Corrections, and work at the SCI main kitchen between July 2003 thru July 2005 as inmate kitchen workers.

RESPONSE: Answering Defendant has no personal knowledge to admit or deny this statement.

9. DOC Food Service Department does not maintain certification records of SCI main kitchen, containing the name of person who performed the inspection of the kitchen.

RESPONSE: Answering Defendant has no personal knowledge to admit or deny this statement.

10. Defendants have completed ServSafe training requirements as part of their training as a DOC Food Service Correctional Officer.

RESPONSE: Answering Defendant has no personal knowledge to admit or deny this statement.

11. DOC Food Service staff has not been trained or educated in the recognition, avoidance and prevention of unsafe conditions at the SCI main kitchen.

RESPONSE: Answering Defendant has no personal knowledge to admit or deny this statement.

12. George A. Jackson's July 19, 2005, "Emergency Grievance" was granted in favor of the grievant by all three (3) levels of the Inmate Grievance Procedure.

RESPONSE: See Response to No. 6.

13. Since the filing of George A. Jackson's July 19, 2005, "Emergency Grievance" the exhaust ventilation system on the "old side of the SCI main kitchen has not been replaced, maintained and operated as to ensure the required protection by maintaining a volume and velocity of exhaust air sufficient to gather dusts, fumes, vapors

or gases from the numerous commercial size convectional, conventional ovens and other commercial equipment.

RESPONSE: Answering Defendant has no personal knowledge to admit or deny this statement.

14. The exhaust system shall be in operation continually during all operations which it is designed to served.

RESPONSE: Answering Defendant has no personal knowledge to admit or deny this statement.

15. There are seven (7) inmate housing buildings within the SCI prison compound.

RESPONSE: Denied.

16. According to the Inmate Grievance DOC Policy 4.4. V procedure:

H. INMATES ARE PROHIBITED FROM SUBMITTED [sic]
MORE THAN ONE GRIEVANCE ARISING FROM A
SINGLE INCIDENT.

RESPONSE: Answering Defendant has retired and does not have sufficient knowledge to admit or deny this statement.

17. Plaintiff George A. Jackson's July 19, 2005, "emergency grievance" was a job issue.

RESPONSE: Answering Defendant has no personal knowledge to admit or deny this statement.

18. All inmate kitchen workers while working in the SCI main kitchen are housed in the same building.

RESPONSE: Answering Defendant does not have sufficient knowledge to admit or deny this statement.

19. There were no established and supervised programs for DOC Food Service staff at the SCI main kitchen prior to July 19, 2005, for the education and training of food service staff in the recognition, avoidance and prevention of unsafe conditions at the SCI main kitchen.

RESPONSE: Answering Defendant does not have sufficient knowledge to admit or deny this statement.

20. Employers need to periodically evaluate their training programs to see if the necessary skills, knowledge and routines are being properly understood and implemented by their trained employees.

RESPONSE: Answering Defendant does not have sufficient knowledge to admit or deny this statement.

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

/s/ Catherine Damavandi
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January 2, 2008

CERTIFICATE OF SERVICE

I hereby certify that on January 2, 2008, I electronically filed the attached *Defendant Stan Taylor's Response to Plaintiff's Request for Admissions* with the Clerk of Court using CM/ECF. I hereby certify that on January 2, 2008, I have mailed by United States Postal Service, the document to the non-registered parties on the attached list.

STATE OF DELAWARE
DEPARTMENT OF JUSTICE

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